

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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:TIANIKWA :HAYWOOD, ET AL.	§	Civil Action
PLAINTIFFS	§	No. 3:22-CV-2174-C
	§	
V.	§	
	§	
TEXAS REALATOR, ET AL.	§	
DEFENDANTS	§	

**PLAINTIFF'S OBJECTION TO THE DEFENDANTS PENNYMAC LOAN SERVICES,
LLC'S AND MACKIE WOLF ZIENTZ AND MANN, P.C.'S MOTION TO DISMISS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 12(B)(5)**

COMES NOW, :Tianikwa :Haywood and :Paul-Douglas :Celestine, Pro-Se invoke
Maritime Law and Federal Law. [U.S.C.A. Const. 5th and 14th].

-NOTICE-

The Due Process clause of the United States Constitution prohibits a court from hearing a case that party has been given proper notice of satisfying this notice's requirement.

In the above cause the Plaintiff has informed all known parties of their interest by a reasonable reliable means, "The United Postal Service." In the above cause the Defendant interfered into RICO Fraud and the Plaintiff can provide Pro-Se of Service by the United States Postal Service and the Defendant did receive the complaint and summons as required by due process of law. The Plaintiff objects to the F.R.C.P. 12 (B)(5) as the service was in the guidelines of the United States Constitution.

The Plaintiff in this case served the Defendant at the home office at 14160 N. Dallas Parkway, Suite 900 Dallas, Texas 75254. The Federal Rule of Civil Procedure governs the service of process in federal court. The Defendant did receive service. The Plaintiff sent summons and complaints together with a waiver to address before stated. The service was issued by registered mail and the First-Class mail was proper.

Hague Convention provides that judicial documents may be served by the postal channel. I.d. Under the Hague Convention Maritime Law applies in that it is postal law. [Article 10 (a) of the Hague Convention is postal law. Under the International Postal Union, Judicial Documents may be served by postal channels]. [293 A.R. 327; R.V. Re. Recognition of at Italian Judgment LLPrel, 2000 WL 33541696]. [**Brockmeyer v. May**] 383 F3d. 798, 811 (9th Cir. 2004).

MARITIME LAW

State Department circular also indicates service by mail is permitted in international civil litigation. [U.S. Dept of State, Circular Service of process abroad in selected material in Int'l Litig. And Arbitration] 688 P/Lit. 7771021 (2003). Under Maritime Law and Hague Convention it provides: "(f) unless otherwise provided by Federal Law, service upon an individual from a waiver that has not been obtained and filled.... May be affected in a place not within any Judicial District of the United States. [4 (f)(1)].

Thus, by this cause being both Maritime Law and Federal Law the Defendant's motion to dismiss pursuant to Federal Rules of Civil Procedure 12(B)(5) should not be granted. The United States government, the United States District Court, and the United States Supreme Court is under Maritime Law. The postage stamp on the document is the fee to move the vessel through

the sea of space and was docketed in the United States District Court For the Northern District of Texas Dallas Division.

PRAYER

The Plaintiff humbly requests that the Honorable Court protect Maritime Law and Federal Law by denying the Defendants' motion. Thank you.

Respectfully Submitted,

:Tianikwa :Haywood

:Tianikwa :Haywood

Date: 11/4/2022

CERTIFICATE OF SERVICE

I certify that the original document was served to:

Pennymac Loan Services, LLC
Defendant
c/o Mark D. Cronenwett
Tex. Bar No. 00787303
Mackie, Wolf, Zientz & Mann P.C.
Parkway Office Center, Suite 900
14160 Dallas Parkway
Dallas, Texas 75254

:Tianikwa :Haywood

: Tianikwa : Haywood

Date: 11/4/2022

CERTIFICATE OF SERVICE

I certify that the original document was served to:

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For the Northern District of Texas
Dallas Division
1100 Commerce Street Room 1400
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:Tianikwa :Haywood

: Tianikwa : Haywood

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